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PETER LABRECK,  
Plaintiff,

vs.

CITADEL INVESTMENT GROUP INC.,  
JOHN DOE MICHIGAN CORP. ENTITY,  
JOHN DOE FLORIDA CORP. ENTITY,  
JOHN DOE ALLEGED CREDITORS,  
Defendants.

Case: 2:15-cv-11912  
Judge: Rosen, Gerald E.  
MJ: Stafford, Elizabeth A.  
Filed: 05-27-2015 At 10:53 AM  
PRIS PETER LABREACK V CITADEL INVESTMENT GROUP INC, ET AL (LG)

COMPLAINT AND DEMAND FOR JURY TRIAL

Now comes, Plaintiff, Peter Labreck, In Pro Per, and states the following in support of his Complaint:

1) This Court has jurisdiction for diversity: Defendant Citadel Investment Group Inc. is a Nevada Corporation, whose primary business is in Arizona, and whose address is: PO Box 73452 Phoenix, AZ 85050; Defendant, John Doe Michigan Corp. Entity, whose primary business is in Michigan, and whose address Plaintiff needs time to obtain via discovery; Defendant, John Doe Florida Corp. Entity is a Florida Corp. Entity, whose primary business is in Florida, and whose address Plaintiff needs time to obtain via discovery; Defendant John Doe Alleged Creditors, are any individual(s) or corporate entity(ies) claiming any lien against, right in, or to Plaintiff's home located at: 43855 Harborview Lane, in Clinton Township, MI 48038. The amount in dispute exceeds the minimum requirement set by United States Code for jurisdiction.

2) Plaintiff makes a demand for a jury trial on all issues in dispute.

3) Plaintiff purchased the real property/home from Defendant Citadel Investment Group Inc. during the first half of 2007, for the sum of \$575,000, said purchase 'closed' at a title company, where Plaintiff purchased title insurance.

4) During the last half of 2007, Plaintiff paid off the mortgages he used to purchase the property. At that time Plaintiff satisfied all debts he owed on the property, and at no time since has Plaintiff mortgaged or otherwise pledged the property as collateral.

5) During October 2014, Plaintiff's attorney had an investigator go to the Macomb County Register of Deeds office to obtain a copy of the Warranty Deed, conveying ownership from Defendant Citadel Investment Group Inc.

Plaintiff, so that Plaintiff could provide a copy to the United States Probation Office. While obtaining Plaintiff's Warranty Deed, said investigator noted at least one lien against Plaintiff's home; filed by Defendants, John Doe Michigan Corp. Entity, and John Doe Florida Corp. Entity for \$48,000 each, (that is \$96,000).


6) Plaintiff does not know who Defendants John Doe Michigan Corp. Entity and John Doe Florida Corp. Entity are. That is, Plaintiff had never heard of them prior to learning of their lien against his home; he has never done business with them, has never received any type of bill or claim of debt owed from them, denies owing them any money, for any reasons, and maintains they have no truthful/lawful reasons to file any lien against his home.

7) Plaintiff owns his home outright, free and clear of all debt, and knows of no truthful/lawful reasons for anybody to file any type of lien or any other type of claim against it.

8) Plaintiff seeks to clear any and all 'cloud' on the title of his home, and brings this action against all Defendants, jointly and individually, for fraud, attempted conversion, violating the federal Fair Debt Collection Act, violating the federal Fair Credit Reporting Act, and in the case of Defendant Citadel Investment Group Inc., breach of contract.

WHEREFORE, Plaintiff demands judgment against Defendants in the amount of \$250,000 and an ORDER directing the Macomb County Register of Deeds to Discharge any and all Defendants liens/encumbrances that come after the 2007 Warranty Deed that conveyed ownership from Defendant Citadel Investment Group Inc., to Plaintiff, within 14 days of the ORDER. Plaintiff also demands fees, costs, attorney fees, and any other good and just award that the Court deems appropriate.

Respectfully submitted:

  
 Peter LaBreck  
 P.O. Box 2308  
 Mt. Clemens, MI 48043

Drafted by Mark Cramer on behalf of  
 Peter LaBreck, who is on "suicide  
 watch."

**CIVIL COVER SHEET FOR PRISONER CASES**

<b>Case No.</b> <u>15-11912</u>		<b>Judge:</b> <u>Gerald E. Rosen</u>		<b>Magistrate Judge:</b> <u>Elizabeth A. Stafford</u>	
<b>Name of 1<sup>st</sup> Listed Plaintiff/Petitioner:</b> PETER LABRECK			<b>Name of 1<sup>st</sup> Listed Defendant/Respondent:</b> CITADEL INVESTMENT GROUP INC, ET AL		
<b>Inmate Number:</b> 359203			<b>Additional Information:</b>		
<b>Plaintiff/Petitioner's Attorney and Address Information:</b>					
<b>Correctional Facility:</b>  MACOMB COUNTY JAIL P.O. BOX 2308 MT. CLEMENTS, MI 48043-23					

**BASIS OF JURISDICTION**

- ☐ 2 U.S. Government Defendant  
☒ 3 Federal Question

**ORIGIN**

- ☒ 1 Original Proceeding  
☐ 5 Transferred from Another District Court  
☐ Other:

**NATURE OF SUIT**

- ☐ 530 Habeas Corpus  
☐ 540 Mandamus  
☒ 550 Civil Rights  
☐ 555 Prison Conditions

**FEE STATUS**

- ☒ IFP *In Forma Pauperis*  
☐ PD Paid

**PURSUANT TO LOCAL RULE 83.11****1. Is this a case that has been previously dismissed?**

- ☐ Yes      ☒ No

➤ If yes, give the following information:

**Court:** \_\_\_\_\_

**Case No:** \_\_\_\_\_

**Judge:** \_\_\_\_\_

**2. Other than stated above, are there any pending or previously discontinued or dismissed companion cases in this or any other court, including state court? (Companion cases are matters in which it appears substantially similar evidence will be offered or the same or related parties are present and the cases arise out of the same transaction or occurrence.)**

- ☐ Yes      ☒ No

➤ If yes, give the following information:

**Court:** \_\_\_\_\_

**Case No:** \_\_\_\_\_

**Judge:** \_\_\_\_\_